

**KELLEY FARRELL, AS WRONGFUL §
DEATH BENEFICIARY OF JACOB §
MAPLE, DECEASED §**

V.

**WILLIAM CARL CORLEY ADN
KLLM TRANSPORT SERVICES,
LLC**

DEFENDANTS.

CIVIL ACTION NO. 4:23-CV-04221

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Kelley Farrell, Plaintiff and as Wrongful Death Beneficiary of Jacob Maple, Deceased, in the above-entitled and numbered cause makes theses initial disclosures as required by FED. R. CIV. P. 26(a)(1).

A. Individuals with Discoverable Information

1. The following are individuals who are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings:

Response:

Kelley Farrell
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Counsel for Plaintiff

William Carl Corley
Defendant

**KLLM Transport Services, LLC
Jeffrey W. Ryan
Molly F. Scott
Chamblee Ryan, P.C.
2777 N. Stemmons Fwy., Suite 1157
Dallas, Texas 75207
Telephone: (214) 905-2003
Facsimile: (214) 905-1213
Counsel for Defendant**

Any physician who has examined and/or treated the Plaintiff.

All witnesses, both fact and expert, identified by other parties in this case.

All persons named in other party's discovery responses in this case.

All witnesses deposed in this case.

All witnesses identified by the parties in depositions.

All persons identified in Plaintiff's medical records.

Any and all individuals identified by the parties in response to Initial Disclosures.

In addition, Plaintiff specifically reserves the right to call any witness who may be timely identified by any other party either past or present, to this lawsuit.

Plaintiff reserves the right to supplement this response.

B. Relevant Documents and Tangible Things

2. The following is a list of documents, data compilations, and tangible things in Plaintiff's possession, custody, or control, described by category and location, that Plaintiff may use to support her claims:

Response:

Any medical and billing records will be supplemented.

C. Information Related to Calculation of Damages

3. A calculation of any category of damages I have suffered:

Response:

Damages will be supplemented.

D. Insurance

4. All insurance agreements required to be disclosed are available for inspection and copying.

Response:

Not applicable.

Respectfully submitted,

LAW OFFICE OF RICHARD J. PRESUTTI, P.C.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2023, a true and correct copy of the foregoing instrument was delivered to all known counsel of record in accordance with the Federal Rules of Civil Procedure, and any applicable Local Rules, as follows:

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/s/ Richard J. Presutti
RICHARD J. PRESUTTI